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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )

CC Docket No. 94-102

Revision of the Commission's Rules  
to Ensure Compatibility with  
Enhanced 911 Emergency  
Calling Systems )

RM-8143

To: The Commission

DOCKET FILE COPY ORIGINAL

**REPLY COMMENTS OF VANGUARD CELLULAR SYSTEMS, INC.**

Vanguard Cellular Systems, Inc. ("Vanguard"), by its attorneys, hereby submits its reply comments in response to the Commission's Public Notice in the above-referenced proceeding.<sup>1/</sup> Vanguard continues to support modifications to the Consensus Agreement reached by the Cellular Telecommunications Industry Association and certain public safety organizations. As shown below, the comments filed in this proceeding demonstrate that the modifications Vanguard described in its comments should be adopted. The Commission also should reject the efforts of the Ad Hoc Alliance for Public Access to 911 (the "Alliance") to impose requirements on wireless services that exceed the obligations of landline carriers.

The comments in this round of this proceeding establish an important basic principle: The best way to expedite the availability of wireless 911 services, both basic and enhanced, is to give wireless carriers the same tools landline carriers already have. Policies that

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<sup>1/</sup> Public Notice, "Commission Seeks Additional Comment in Wireless Enhanced 911 Rulemaking Proceeding Concerning 'Consensus Agreement' Between Wireless Industry Representatives and Public Safety Groups," DA 96-198, rel. Feb. 16, 1996 (the "Public Notice"). The Public Notice requested additional comments in the Commission's pending wireless 911 rulemaking. See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Notice of Proposed Rulemaking*, CC Docket No. 94-102, rel. October 19, 1994.

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advance that goal, such as making funding available to wireless carriers, will serve the public interest. Policies that do not advance that goal, such as imposing unfunded obligations that are divorced from consideration of local needs, will not. Consequently, the Commission's best course in this proceeding is to adopt rules that tie wireless carriers' obligations to the expressed needs of local communities and to the availability of funds to compensate wireless carriers for meeting those needs. The Commission also should avoid imposing obligations on wireless carriers that have no parallel in the landline environment, such as the Alliance's proposal that all wireless phones — whether or not they ever have been activated — should be able to connect to 911. It must be emphasized that Vanguard, like almost all carriers, supports the important goal of increasing public access to 911 and E911 services. The Commission must be careful, however, to avoid adopting mechanisms that will prevent efficient achievement of this goal.

**I. There Is Strong Support for Appropriate Modifications to the Consensus Agreement.**

In its comments, Vanguard proposed certain modifications to the Consensus Agreement. Vanguard's comments showed that the Commission should not impose stringent deadlines for compliance with the proposed Phase II requirements, particularly in a rapidly-changing technological environment, and that E911 requirements should be tied to funding from appropriate state and local mechanisms. Vanguard Supplemental Comments at 6-8.<sup>2/</sup> Indeed, the best approach is to encourage wireless carriers and local communities to work

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<sup>2/</sup> All comments filed in response to the Notice will be referred to in these reply comments as "Supplemental Comments."

together to find the best solutions for their situations. Matching compliance obligations with the availability of funding will achieve that result.

The comments confirmed the wisdom of modifying the Consensus Agreement to encourage cooperation between wireless carriers and communities. First, it would be unwise to impose hard and fast deadlines. Comments showed that there are significant technical questions to answer before implementing the requirements proposed in the Consensus Agreement. For instance, rural cellular carriers note that the ALI technologies described in the Consensus Agreement may have limited utility in rural areas. At the same time, the 125 meter RMS ALI requirement may be unnecessarily stringent in many rural markets. *See, e.g.,* Ad Hoc Rural Cellular Coalition Supplemental Comments at 4-5. While KSI, Inc. touts the results of its field trials, the Commission should recognize the significant limitations on those results. KSI Supplemental Comments at 5-7. KSI's tests were conducted using standard AMPS transmissions in areas with many cell sites and relatively flat terrain. Assuming that the KSI tests actually result in a viable commercial product for that situation, they do not uniformly solve the problems of rural carriers, address the needs of carriers in mountainous regions or, for that matter, constitute a solution for NAMPS, TDMA, CDMA or any of the other non-AMPS transmission technologies that will become increasingly important over the next few years.<sup>3/</sup> It is noteworthy that the only major equipment

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<sup>3/</sup> KSI does not address these questions. Consequently, KSI's suggestion that the Commission impose strict, unalterable deadlines for compliance with ALI requirements is disingenuous at best. KSI Supplemental Comments at 3. KSI may support strict deadlines because it believes it will gain a commercial advantage if the rules require implementation of ALI before less expensive and more attractive technologies are developed. The Commission should recognize that it is not in the public interest to adopt rules that confer a commercial advantage on one company, especially if doing so thwarts emerging technologies.

manufacturer to comment urged caution in imposing compliance deadlines on wireless carriers. *See* Northern Telecom Supplemental Comments at 3.

Even if all the technical issues are solved, it would be unreasonable to require wireless carriers to provide advanced 911 capabilities before funding for those capabilities is available. Providing funding is important as a matter of equity, because wireless carriers should not be required to bear the financial burden of compliance when landline carriers are reimbursed for their costs. Funding also is important as a matter of responsible public policy, because the availability of funding is one of the best indicators that local public safety authorities desire wireless E911 capabilities to be available. There would be, after all, little point to requiring a wireless carrier to provide ALI for all 911 calls if the local public safety authorities do not utilize 911.<sup>4/</sup> For instance, some West Virginia localities in the coverage area of Vanguard's Huntington cellular system are still in the process of planning their implementation of landline E911. Until these localities focus on their needs for wireless 911, it would be pointless for Vanguard to implement any advanced 911 features. Equally important, until local public safety officials determine what features they need, it is unlikely that funding will be available to cover the expenses of implementation.

Thus, the Commission should not impose strict deadlines for compliance with E911 requirements. Instead, it should adopt an approach that will base E911 implementation on the needs and funding commitments of local communities. This will encourage cooperation and, at the same time, help tailor wireless E911 to community needs.

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<sup>4/</sup> As the rural cellular carriers describe, there are many parts of the country where basic 911 service is not yet available, let alone E911. Ad Hoc Rural Cellular Coalition Supplemental Comments at 5.

## **II. The Commission Should Not Limit the Availability of 911 Funding.**

One party, the Alliance, proposes that the Commission should adopt rules requiring wireless carriers to offset their reimbursable costs for 911 upgrades with “the profits reasonably expected to be made from other uses of the 911 equipment and technology.” Alliance Supplemental Comments at 3-4. The Commission should reject this proposal as unworkable and unsound.

As a practical matter, there is no basis for calculating the set-offs the Alliance proposes. Even assuming that some 911 upgrades also will have commercial value, there is no way to tell what that value might be. At the same time, many of the expenses incurred in providing 911 service, such as the installation of trunks to PSAPs, are unlikely to produce any revenue at all.

Moreover, there also is no reason to treat wireless carriers any differently than landline carriers in this respect. The level of reimbursement provided to a wireless carrier should be determined between the carrier and local public safety authorities. If a technology used for E911 also has commercial value, it is likely that issue will be a part of those negotiations. Moreover, while the Alliance apparently is concerned that wireless carriers may earn a profit from providing 911 service, *id.* at 19, the fact is that landline carriers’ charges to public safety providers (and the amounts they are reimbursed for their expenses) are set at a level that includes profits. Wireless carriers are no less entitled to reasonable compensation for providing 911 services.

### **III. Wireless Carriers Should Not Be Required to Connect Calls from Unactivated Phones.**

The Alliance also uses this round of comments to reiterate its proposal to require wireless providers to accept calls from handsets that never have been activated. *See Alliance Supplemental Comments at 7-11.* This is another attempt by the Alliance to impose requirements on wireless carriers that are not imposed on landline carriers. The Alliance's proposal should be rejected as contrary to the public interest.

To understand the Alliance's proposal, it is useful to consider how it would work in the landline context. If the Alliance proposal were adopted for landline phones, a customer would be able to walk into a store, buy a phone, and expect to be able to call 911 by plugging the phone into any phone jack in the country. Under the Alliance proposal, it would not matter if the line to which the phone was connected was activated or not — 911 calls would have to go through. There is no such requirement for landline carriers and, as a matter of equity, there should be no such requirement for wireless carriers either.

There also are significant technical issues that make the Alliance's proposal impractical. For instance, an unactivated phone does not have a telephone number associated with it. Because cellular networks use both the electronic serial number and the telephone number associated with a telephone to recognize it, modifications would be necessary before a network could accept calls from an unactivated phone.<sup>5/</sup> Even then, important 911 capabilities, such as ringback, could be seriously impaired for unactivated phones.

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<sup>5/</sup> In this respect, the analogy to landline networks described above breaks down. A landline network, at least in theory, does not require a telephone number for the calling party's telephone.

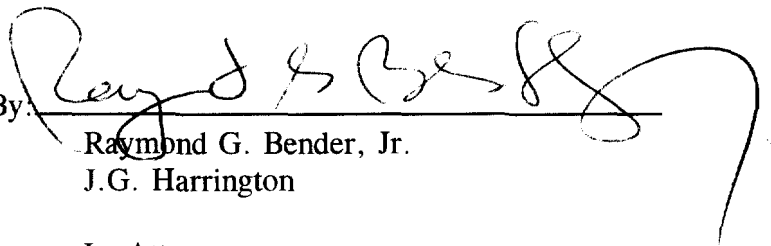
In contrast to the Alliance's unworkable proposal, Vanguard's approach to 911 calls is reasonable and advances the public interest. As Vanguard has described previously in this proceeding, it accepts 911 calls from its current customers in good standing, from roamers (even if the roamer's home carrier is in default of its roaming agreement) and even from customers who have been disconnected for various reasons, including nonpayment. This policy balances the technical and practical concerns raised by the Alliance proposal with Vanguard's desire to assure access to public safety services whenever possible. It is far superior to the unreasonable requirements the Alliance would impose on Vanguard and other wireless providers.

#### IV. Conclusion

For all of these reasons, Vanguard Cellular Systems, Inc. urges the Commission to adopt rules consistent with its comments and these reply comments in this matter.

Respectfully submitted,

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March 11, 1996

## CERTIFICATE OF SERVICE

I, Tammi A. Foxwell, a secretary at the law firm of Dow, Lohnes & Albertson, do hereby certify that on this 11th day of March, 1996, I caused copies of the foregoing "Reply Comments" to be served, by first-class mail except where indicated as hand delivery, to the following:

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\*Via hand delivery.